

TROY LAW, PLLC

ATTORNEYS / COUNSELORS AT LAW

Tel: (718) 762-1324 troylaw@troypllc.com Fax: (718) 762-1342
41-25 Kissena Boulevard, Suite 110, Flushing, NY 11355

January 11, 2023

Via ECF

Hon. Lois Bloom, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: Plaintiff's Letter Motion for Extension
to Oppose Defendants' Motion to Stay Discovery
Stidhum v. 161-10 Hillside Auto Ave, LLC, No. 21-cv-07163 (PKC) (RLM), (E.D.N.Y.)**

Dear Judge Bloom:

We respectfully request time till January 16, 2023 to oppose Defendants' Motion to Stay Discovery. This is Plaintiff's first request and Defendants consents to this request. The brief extension will not prejudice any party, as discovery was not stayed and Defendants have already unilaterally adjourned the deposition scheduled for January 9, 2023 for Ishaque Thanwalla and refused to confirm the depositions of the remaining Defendants at any of the noticed dates or proposed other dates for rescheduling.

Defendants' due date for turning in outstanding discovery remains January 12, 2023. *See* Docket Entry No. 37.

We request the brief extension because my managing associate, Aaron B. Schweitzer is on trial in the Eastern District of New York federal court at Central Islip this week, and my associate Tiffany Troy is covering conferences and depositions today and tomorrow, and a continued trial Friday, and so we have limited availability to draft the opposition.

Respectfully Submitted,

/s/ John Troy
John Troy
Attorney for Plaintiffs

JT/mh
cc:.. (via ECF)